

U.S. DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN
UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

2013 AUG 20 P 12:45

UNITED STATES OF AMERICA,

JON A. SANFILIPPO
CLERK

Plaintiff,

Case No.

13 - CR155

v.

JEFFREY W. FELDMAN,

[18 U.S.C. §§ 2252A(a)(2) and
2252A(a)(5)(B)]

Defendant.

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES:

1. Between on or about June 18 and on or about June 20, 2012, in the State and Eastern District of Wisconsin,

JEFFREY W. FELDMAN

knowingly received child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), that had been mailed, shipped, and transported in interstate and foreign commerce by any means, including by computer.

2. The child pornography received by the defendant included a video identified as follows:

| Date Received | Title | Description |
|-----------------------------------|--|--|
| Between June 18 and June 20, 2012 | 2010 Kait 5Yo - First Taste Of Dad Cum.mpg | This 39 second video depicts a naked prepubescent child; she appears to be under 6 years old. The child is being made to perform oral sex on an adult male who is naked from at least the waist down. The adult male ejaculates in her mouth and the child appears disgusted as she spits out the ejaculate. |

All in violation of Title 18, United States Code, Section 2252A(a)(2).

COUNT TWO

THE GRAND JURY FURTHER CHARGES:

1. Between on or about June 21 and on or about June 23, 2012, in the State and Eastern District of Wisconsin,

JEFFREY W. FELDMAN

knowingly received child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), that had been mailed, shipped, and transported in interstate and foreign commerce by any means, including by computer.

2. The child pornography received by the defendant included a video identified as follows:

| Date Received | Title | Description |
|-----------------------------------|--|---|
| Between June 21 and June 23, 2012 | Hmm Gracel Series (Cambodia) - Rona 8Y Bondage Vid 2.mpg | This 6 minute and 46 second video depicts a child; she appears to be under 9 years old. The child's arms and legs are bound together throughout the video with a yellow rope and she is naked except for wearing a pair of pink stockings. The child is being made to perform oral sex on an adult male during the entire video. The adult male is naked from at least the waist down. At different times during the video the adult male digitally manipulates the child's vagina. |

All in violation of Title 18, United States Code, Section 2252A(a)(2).

COUNT THREE

THE GRAND JURY FURTHER CHARGES:

1. Between on or about December 26 and on or about December 28, 2012, in the State and Eastern District of Wisconsin,

JEFFREY W. FELDMAN

knowingly received child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), that had been mailed, shipped, and transported in interstate and foreign commerce by any means, including by computer.

2. The child pornography received by the defendant included a video identified as follows:

| Date Received | Title | Description |
|---|---|--|
| Between December 26 and December 28, 2012 | Pedo Ptsc 9Yo Jenny Sucking Daddys Dog, Naked Look At Her Lil Pussy.jpg | This image depicts a child; she appears to be under 10 years old. The child is completely naked and her vagina is exposed. The child is performing oral sex on a large breed male dog which has an erect penis. The child is underneath the dog which is standing on all 4 legs. |

All in violation of Title 18, United States Code, Section 2252A(a)(2).

COUNT FOUR

THE GRAND JURY FURTHER CHARGES:

1. Between on or about January 11 and on or about January 13, 2013, in the State and Eastern District of Wisconsin,

JEFFREY W. FELDMAN

knowingly received child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), that had been mailed, shipped, and transported in interstate and foreign commerce by any means, including by computer.

2. The child pornography received by the defendant included a video identified as follows:

| Date Received | Title | Description |
|---|--------------------------------|---|
| Between January 11 and January 13, 2013 | Tara 7Yo Girl-Eat Cum-Pthc.avi | This 1 minute and 8 second video begins with the following phrase, "Tara 8 years old 'Ass to Mouth'...her daddy really treats her like a total fucking whore!" The video depicts a child; she appears to be under 8 years old. The child is fully naked and only wearing a multi-colored, Mardi Gras type mask. The child is being forced to perform oral sex on an overweight adult male who appears entirely naked. The male directs the child how to act and calls her a "slut." He holds her head and tells her that she is "good." The child chokes and he tells her to "choke on it." He tells her "all the way down" and then directs her to go onto a bed where she lies on her back with her vagina exposed. The child is making choking sounds. |

All in violation of Title 18, United States Code, Section 2252A(a)(2).

COUNT FIVE

THE GRAND JURY FURTHER CHARGES:

1. Between on or about January 11 and on or about January 13, 2013, in the State and Eastern District of Wisconsin,

JEFFREY W. FELDMAN

knowingly received child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), that had been mailed, shipped, and transported in interstate and foreign commerce by any means, including by computer.

2. The child pornography received by the defendant included a video identified as follows:

| Date Received | Title | Description |
|---|---|--|
| Between January 11 and January 13, 2013 | Toddler Girl 3Yo Sucking Pacifier Shows Pussy And Gets Cock Tip In Kleuterkutje.mpg | This 3 minute and 18 second video depicts a child; she appears to be under 2 years of age. The child is wearing a blue dress but naked from the waist down and lying on a bed. An adult pulls the child's dress up, exposing her bare vagina. The adult then spreads the child's legs and vagina apart and begins to stroke the child's vagina. The camera pans back from the child showing her face and holding a stuffed animal. The adult spreads the child's vagina apart and then performs oral sex on the child. The camera pans back again to show that the child is sucking on a pacifier. The child then spreads her legs apart and touches her vagina. The camera closes in on the child's vagina and the adult assists the child in rubbing her vagina. The camera pans over the child and then reveals an erect penis touching the child's vagina. The male rubs his penis several times against the child's vagina. The male then masturbates and tries to insert his penis into the child's vagina but finally pulls away as the movie ends. |

All in violation of Title 18, United States Code, Section 2252A(a)(2).

COUNT SIX

THE GRAND JURY FURTHER CHARGES:

1. On or about January 24, 2013, in the State and Eastern District of Wisconsin,

JEFFREY W. FELDMAN

did knowingly possess material which contained an image of child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), that involved a prepubescent minor and a minor who had not attained 12 years of age, that had been transported in interstate and foreign commerce, including by computer, and that was produced using materials which had been transported in interstate commerce.

2. The child pornography possessed by the defendant included files identified as follows:

| Title | Description |
|---|--|
| (Pthc) 6Yo Babyj - Bondage And True Deep Anal Penetration.mpg | This one minute and twenty-nine second video depicts a child; she appears to be under 10 years of age. The child is naked from the waist down. The child's feet are bound with white ligatures in a way that spreads the child's legs apart. The child's upper body and face are covered with a dark blue blanket. An adult male is shown having penis to vagina sexual intercourse with the child. The adult male then penetrates the child's anus with his erect penis and continues to have penis to anus sexual intercourse with the child. The video eventually goes black for the last 11 seconds. |
| 3yo Cumshot Ptsc Pedo Kleuterkutje.mpg | This 6 minute and 37 second video depicts a child: she appears to be under two years of age. The child is lying on a bed and next to her is a used disposable diaper. The child is completely naked. The child has her legs spread apart an adult male places his erect penis on the child's vagina and she reaches down with her hand and touches the man's penis. The adult male then pulls her into a sitting position so that he can make her perform oral sex. The child touches the adult's penis with her mouth and smiles and |

| Title | Description |
|--|---|
| | says, "Hi" to the adult. The adult pushes the child's head back down to his penis and while she is made to perform oral sex upon him. The adult flips the child over to her stomach and he rubs his erect penis on the child's buttocks. The adult bends down and begins performing oral sex upon the child. The adult stands up and masturbates while touching the child's buttocks. The adult flips the child back onto her back and continues to masturbate while rubbing the child's vagina. The adult next puts his penis next to her mouth as he masturbates until he ejaculates on the child's stomach. The child begins to cry and attempts to wipe off the ejaculate with her hands. |
| 0-KIDDY-PTHC bw 024a-Dog Fucks 5yo Girl(1).jpg | This image depicts a child: she appears under 11 years of age and is clearly pre-pubescent. She has a gag around her mouth and her legs and arms are bound with black ligatures. She is naked except for white knee high socks and is on her back with her legs spread open and her genitalia exposed. A large black dog with an erect penis is attempting to have penis to vagina intercourse with her. |

All in violation of Title 18, United States Code, Section 2252A(a)(5)(B).

FORFEITURE ALLEGATION

1. That, as a result of convictions for the violations of Title 18, United States Code, Section 2252A, set forth above, the defendant, shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 2253, the following:

a. Any visual depiction described in Title 18, United States Code, Section 2252, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped, or received in violation of such offense;

b. Any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such an offense; and

c. Any property, real or personal, used or intended to be used to commit or to promote the commission of such offense, including but not limited to:

- i. A Dell Inspiron 530, serial number HYX4VF1,
- ii. Western Digital My Book Essential, serial number WMC1T0358400,
- iii. Western Digital My Book Essential, serial number WMAZA0052668,
- iv. Western Digital My Book, serial number WCANU1155143,
- v. Western Digital My Book, serial number WCAVY0868325,
- vi. Western Digital My Book, serial number WCASJ0087391,
- vii. MadDog External USB Drive, serial number 3JT4B7LH,
- viii. Western Digital My Book, serial number WCAZA0078782T,
- ix. Western Digital My Book, serial number WCAZA0078878T,
- x. Western Digital My Book, serial number WCAPW4354447,
- xi. Western Digital My Book, serial number WCASJ1003049,
- xii. Western Digital My Book, serial number WCAPW0572841,
- xiii. Western Digital My Book, serial number WMC1T0276658,
- xiv. Maxtor Black Armor External Hard Drive, serial number 2HC04653,
- xv. Maxtor Black Armor External Hard Drive, serial number 2HC0491M,
- xvi. Western Digital My Book, serial number WCASJ0854891, and
- xvii. Five additional recovered storage devices.

2. If any of the property subject to forfeiture, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided


without difficulty; the United States of America shall be entitled to forfeiture of substitute property, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 2253(b), and Title 28, United States Code, Section 2461(c).

A TRUE BILL:



FOREPERSON

Dated: 8/20/2013



JAMES L. SANTELLE
United States Attorney